

# Exhibit “B”

# Exhibit “B-1”

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Location : All Courts Images

**REGISTER OF ACTIONS****CASE NO. C-1838-21-J****Jose Luis Castellanos VS. Home Depot U.S.A., Inc.**§  
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§  
§Case Type: **Injury or Damage - Other (OCA)**Date Filed: **05/13/2021**Location: **430th District Court****PARTY INFORMATION****Defendant Home Depot U.S.A., Inc.****Attorneys**  
**JOELLE G. NELSON**  
*Retained*  
713-659-6767(W)**Plaintiff Castellanos, Jose Luis****EZEQUIEL REYNA, Jr.**  
*Retained*  
956-968-9556(W)**EVENTS & ORDERS OF THE COURT**

**OTHER EVENTS AND HEARINGS**

05/13/2021 [Original Petition \(OCA\)](#)

05/17/2021 **Citation**  
Home Depot U.S.A., Inc. Served 05/21/2021  
Returned 06/08/2021

05/17/2021 [Citation Issued](#)

06/14/2021 [Special Exceptions](#)  
AND ANSWER TO PLAINTIFFS ORIGINAL PETITION ( DEFENDATNS HOME DEPORT U.S.A INCS)

06/14/2021 [Motion For Leave](#)  
AND OBJECTIONS TO PLAINTIFFS RUEL 193.7 NOTICE

06/15/2021 [Motion for Docket Control Conference, Filed](#)

06/15/2021 [Order Setting Hearing](#)  
ON MOTION FOR TELEPHONIC DOCKET CONTROL CONFERENCE

06/15/2021 **E-Filing Forwarded to Court Queue**  
ORDER SETTING HEARING ON MOTION FOR TELEPHONIC DOCKET CONTROL CONFERENCE

06/15/2021 **Order Setting DCC, Signed**

06/15/2021 [Order Setting DCC, Signed](#)  
TELEPHONIC

06/16/2021 [Notice Sent](#)  
ORDER SETTING HEARING ON TELEPHONIC DOCKET CONTROL CONFERENCE

08/24/2021 **Docket Control Conference Hearing/Telephonic** (3:00 PM) (Judicial Officer Ramon, Israel, Jr.)

**FINANCIAL INFORMATION**

	<b>Defendant</b> Home Depot U.S.A., Inc.		
	Total Financial Assessment		40.00
	Total Payments and Credits		40.00
	<b>Balance Due as of 06/18/2021</b>		<b>0.00</b>
06/14/2021	Transaction Assessment		40.00
06/14/2021	EFile Payments from TexFile	Receipt # DC-2021-010158 Home Depot U.S.A., Inc.	(40.00)
	<b>Plaintiff</b> Castellanos, Jose Luis		
	Total Financial Assessment		360.00
	Total Payments and Credits		360.00
	<b>Balance Due as of 06/18/2021</b>		<b>0.00</b>
05/13/2021	Transaction Assessment		360.00
05/13/2021	EFile Payments from TexFile	Receipt # DC-2021-008071 Castellanos, Jose Luis	(360.00)

# Exhibit “B-2”

**C-1838-21-J**  
CAUSE NO. \_\_\_\_\_

JOSE LUIS CASTELLANOS  
Plaintiff

v

HOME DEPOT U.S.A, INC.  
Defendant

§  
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§

IN THE DISTRICT COURT

\_\_\_\_\_ JUDICIAL DISTRICT

HIDALGO COUNTY, TEXAS

**PLAINTIFF'S ORIGINAL PETITION, JURY DEMAND, NOTICE OF INTENT  
TO USE DOCUMENTS PURSUANT TO TEXAS RULES OF CIVIL  
PROCEDURE, RULE 193.7 AND PLAINTIFF'S REQUEST FOR NOTICE BY  
DEFENDANTS OF INTENT TO SEEK ADMISSION OF CRIMINAL  
CONVICTIONS OF WITNESSES PURSUANT TO TEXAS RULES OF  
EVIDENCE, RULE 609(f)**

TO THE HONORABLE JUDGE OF SAID COURT:

COMES NOW JOSE LUIS CASTELLANOS, Plaintiff and files this his  
Original Petition complaining of HOME DEPOT U.S.A, INC., Defendant and  
shows:

**I.  
DISCOVERY CONTROL PLAN**

Plaintiff intends to proceed under Discovery Control Plan No. 2.

**II.  
PLAINTIFF'S DESIGNATION OF TRCP 47(b) &  
(c) MONETARY RELIEF AND DISCOVERY CONTROL PLAN**

The damages sought by Plaintiff are within the jurisdictional limits of the  
court. Plaintiff seeks damages over \$1,000,000.00.

Plaintiff intends that discovery be conducted under Discovery Level II.

**III.  
PARTIES**

Plaintiff is an individual who resides in Hidalgo County, Texas.

**C-1838-21-J**

Defendant, HOME DEPOT U.S.A., INC., is domestic company doing business in the State of Texas. Defendant may be served with process by serving its registered agent as follows:

Corporation Service Company  
d/b/a CSC-Lawyers Incorporating Service Company  
211 E. 7<sup>th</sup> Street, Suite 620  
Austin, Texas 78701-3218

**IV.  
JURISDICTION**

This court has jurisdiction over the controversy because the incident made the basis of the suit occurred in Texas and since Plaintiff's damages are within the Court's jurisdictional limits.

**V.  
VENUE**

Venue is proper in Hidalgo County, Texas because the incident made the basis of this suit occurred in that county.

**VI.  
FACTS**

On November 18, 2019, Plaintiff was a customer of Defendant HOME DEPOT U.S.A., INC., located at 1500 West Expressway 83, Weslaco, Hidalgo County, Texas.

As a result of Defendant HOME DEPOT U.S.A., INC., holding open its premises for business in this manner and as a result of the purpose of Plaintiff's visit to such premises, Plaintiff JOSE LUIS CASTELLANOS was at all times an invitee as the phrase is known in the law.

**C-1838-21-J**

As Plaintiff was exiting the premises, Defendant HOME DEPOT U.S.A., INC.'s employee was assisting a customer push a metal cart loaded with unsecured lumber.

As Plaintiff walked past Defendant's employee, Defendant's employee pushed the cart by touching the lumber causing the lumber to fall onto Plaintiff's left shoulder and arm.

The impact was so severe that it caused Plaintiff to fall onto his buttocks causing Plaintiff to sustain severe injuries.

**VII.  
DEFENDANT HOME DEPOT U.S.A., INC.'S LIABILITY**

At all times herein, HOME DEPOT U.S.A., INC., owned the property located at 1500 West Expressway 83, Weslaco, Texas.

At the time of the accident, Defendant's agent, representative, and/or employee carelessly and without warning pushed the metal cart loaded with unsecure lumber by touching the lumber to push it forward.

The method used by Defendant's employee to push the metal cart caused the lumber to fall onto Plaintiff's body.

At all times pertinent herein, Defendant's agent, representative and/or employees was acting in the course and scope of his employment with Defendant and was guilty of negligent conduct in the following manner:

**C-1838-21-J**

- In failing to assure that the lumber loaded onto the metal cart was properly secured;
- In failing to assure that he pushed the metal cart in a safe manner;
- In failing to be aware of customer surroundings; and

In failing to create a safe environment.

Each of the foregoing acts of negligence was a proximate cause of Plaintiff's resulting injuries and damages.

**VIII.  
DEFENDANT HOME DEPOT U.S.A., INC.'S NEGLIGENCE**

The evidence will further show that because of Defendant HOME DEPOT U.S.A., INC.'S negligence, Plaintiff sustained injuries and damages that were proximately caused by the following acts of negligence on the part of HOME DEPOT U.S.A., INC.:

- In failing to use ordinary care in supervising its employees;
- In failing to use ordinary care in training its employees on the proper manner in which to maintain a safe environment for their patrons.

Each of the foregoing acts of negligence was a proximate cause of Plaintiff's resulting injuries and damages.

**IX.  
DAMAGES**

As a direct and proximate result of Defendant's acts and omissions, Plaintiff suffered serious and permanent personal injuries. Plaintiff's damages exceed the minimum jurisdictional limits of this Court, and include but are not limited to:



**C-1838-21-J**

- A. Reasonable medical care and expenses in the past. These expenses were incurred by Plaintiff, for the necessary care and treatment of the injuries resulting from the collision complained of herein and such charges are reasonable, usual and customary charges for such services in Hidalgo County and Cameron County, Texas;
- B. Reasonable and necessary medical care and expenses which will in all reasonable probability be incurred in the future;
- C. Physical pain and suffering in the past;
- D. Physical pain and suffering in the future;
- E. Physical impairment in the past;
- F. Physical impairment which, in all reasonable probability, will be suffered in the future;
- G. Mental anguish in the past;
- H. Mental anguish in the future; and
- I. Cost of medical monitoring in the future.

**X.****NOTICE OF INTENT TO USE DOCUMENTS PRODUCED BY  
DEFENDANT IN RESPONSE TO PLAINTIFF'S WRITTEN DISCOVERY  
PURSUANT TO TEXAS RULES OF CIVIL PROCEDURE, RULE 193.7**

Plaintiff hereby serves notice that Plaintiff intends to use any and all documents produced by the Defendant in response to written discovery propounded to the Defendant. As such, the produced documents are self-authenticating pursuant to TRCP, Rule 193.7.

**C-1838-21-J****XI.****PLAINTIFF REQUESTS FOR NOTICE BY DEFENDANTS OF  
INTENT TO SEEK ADMISSION OF CRIMINAL CONVICTIONS OF  
WITNESSES PURSUANT TO TEXAS RULES OF EVIDENCE RULE 609(f)**

Plaintiff demands timely written notice by Defendant of Defendant's intention to seek admission of criminal convictions as defined in TRE Rule 609(a) against any witness designated by any party as a relevant fact witness, testifying expert witness and/or any consulting expert witness whose mental impressions or opinions have been reviewed by a testifying expert witness.

**XII.****PREJUDGEMENT INTEREST**

Plaintiff seeks pre-judgment interest on the past damages found by the trier of fact.

**XIII.****RESERVATION OF RIGHTS**

Plaintiff reserves the right to prove the amount of damages at trial. Plaintiff also reserves the right to amend this petition to add additional causes of action as further discovery is completed and as his investigation continues.

**XIV.****CONDITIONS PRECEDENT**

Pursuant to Rule 154 of the Texas Rules of Civil Procedure, all conditions precedent to Plaintiff's right to recover herein and to Defendant's liability have been performed or have occurred.

**XV.****JURY DEMAND**

Plaintiff demands a trial by jury and has tendered the jury fee.

**C-1838-21-J****PRAYER**

**WHEREFORE, PREMISES CONSIDERED,** Plaintiff JOSE LUIS CASTELLANOS respectfully prays that the Defendant be cited to appear and answer herein, and that upon a final hearing of the cause judgment be entered for the Plaintiff against Defendant in an amount within the jurisdictional limits of the Court; actual damages shown, together with pre-judgment interest (Beginning on the 180<sup>th</sup> day after the date the Defendant first received written notice of the claim or on the date the lawsuit was filed, whichever occurs first); post-judgment interest at the legal rate, costs of court; and such other and further relief to which the Plaintiff may be entitled at law or in equity.

Respectfully submitted,

LAW OFFICES OF EZEQUIEL REYNA, JR., P.C.



---

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[cristina@zreynalaw.com](mailto:cristina@zreynalaw.com)  
702 W. Expressway 83, Suite 100  
Weslaco, Texas 78596  
(956) 968-9556 Phone / (956) 969-0492 Fax  
ATTORNEY FOR PLAINTIFF

# Exhibit “B-3”

CAUSE NO. CL-1838-21-J

JOSE LUIS CASTELLANOS  
Plaintiffs

V.

HOME DEPOT U.S.A, INC.  
Defendants§  
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IN THE DISTRICT COURT

430TH JUDICIAL DISTRICT


HIDALGO COUNTY, TEXAS

**SERVER'S RETURN**

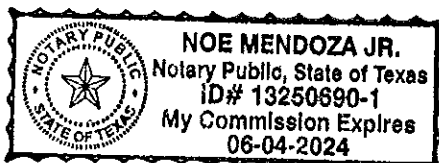
Before me, the undersigned notary, on this day, personally appeared Lory Ramirez, a person whose identity is known to me. After I administered an oath to her, upon this oath he said:

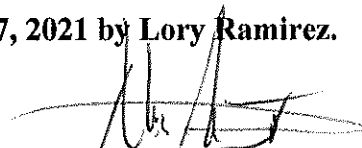
"My name Lory Ramirez, and I make the following representation to the judge of the Court regarding the service of citation in this case:


1. I received this citation on May 18, 2021. Executed it by mailing from the United States Post Office in Weslaco, Texas, a true copy of the citation, with a copy of the Original Petition attached, by certified mail, return receipt requested (item # 7021 0350 0001 1927 1401) on May 19, 2021 to Home Depot U.S.A, Inc by serving, corporation service company d/b/a CSC- Lawyers Incorporating Service Company 211E. 7<sup>th</sup> Street, Suite 620 Austin Tx 78701. On May 21, 2021 the citation was accepted and return receipt was signed. The return receipt, with the addressee's signature is attached.
2. I am not a party to, nor do I have any interest in, the outcome of this case.
3. I am more than 18 years of age.
4. I am familiar with the Texas Rules of the Civil Procedure and other rules and statutes relating to service of citation.

  
 Lory Ramirez PSC12231 EXP 8/31/2023

SUBSRIED AND SWORN TO ME, on June 07, 2021 by Lory Ramirez.



  
 Notary Public State of Texas

SENDER: COMPLETE THIS SECTION		COMPLETE THIS SECTION ON DELIVERY	
<ul style="list-style-type: none"><li>■ Complete items 1, 2, and 3.</li><li>■ Print your name and address on the reverse so that we can return the card to you.</li><li>■ Attach this card to the back of the mailpiece, or on the front if space permits.</li></ul>		<b>A. Signature</b> <b>Anna Mendoza</b> <input type="checkbox"/> Agent <input type="checkbox"/> Addressee	
<b>1. Article Addressed to:</b> Home Depot U.S.A., Inc By Sining Corporation Service Company d/b/a CSC - Lawyers Incorporating Service Company 211 E. 7th Street, Suite 1000 Austin, Tx 78701-3218		<b>B. Received by (Printed Name)</b>	<b>C. Date of Delivery</b> MAY 21 2021
 9590 9402 6644 1060 2486 38		<b>D. Is delivery address different from item 1? <input type="checkbox"/> Yes</b> If YES, enter delivery address below: <input type="checkbox"/> No	
<b>2. Article Number (Transfer from service label)</b> 9590 9402 6644 1060 2486 38		<b>3. Service Type</b> <input type="checkbox"/> Adult Signature <input type="checkbox"/> Priority Mail Express® <input type="checkbox"/> Adult Signature Restricted Delivery <input type="checkbox"/> Registered Mail™ <input type="checkbox"/> Certified Mail® <input type="checkbox"/> Registered Mail Restricted Delivery <input type="checkbox"/> Certified Mail Restricted Delivery <input type="checkbox"/> Signature Confirmation™ <input type="checkbox"/> Collect on Delivery <input type="checkbox"/> Signature Confirmation Restricted Delivery <input type="checkbox"/> Collect on Delivery Restricted Delivery <input type="checkbox"/> Insured Mail <input type="checkbox"/> Insured Mail Restricted Delivery (over \$500)	

PS Form 3811, July 2020 PSN 7530-02-000-9053

Domestic Return Receipt

# Exhibit “B-4”

**CAUSE NO. C-1838-21-J****JOSE LUIS CASTELLANOS**  
***Plaintiff*****v.****HOME DEPOT U.S.A., INC.**  
**d/b/a THE HOME DEPOT*****Defendants***§  
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§**IN THE DISTRICT COURT OF****HIDALGO COUNTY, TEXAS****430<sup>th</sup> JUDICIAL DISTRICT****DEFENDANT HOME DEPOT U.S.A., INC.'S SPECIAL EXCEPTIONS AND  
ANSWER TO PLAINTIFF'S ORIGINAL PETITION**

TO THE HONORABLE JUDGE OF SAID COURT:

COMES NOW, Home Depot U.S.A., Inc., ("Home Depot") Defendant in the above-styled and numbered cause of action and files its Special Exceptions and Answer to Plaintiff's Original Petition and would respectfully show the Court the following:

**I. Special Exceptions**

Defendant specially excepts to paragraphs of the Petition wherein Plaintiff seeks recovery for unspecified damages, and pursuant to Tex. R. Civ. P. 56, requests that Plaintiff be required to itemize all special damages for which Plaintiff seeks recovery.

Defendant further specially excepts to the paragraph of the Petition where in it is alleged that Plaintiff seeks recovery on a negligence theory. Plaintiff has only pled facts that permit recovery on a premises liability theory. Accordingly this claim should be stricken and Plaintiff should be required to re-plead either facts that support these theories of recovery or plead a legal theory of recovery consistent with the facts pled.

**II. General Denial**

Defendant asserts a general denial as is authorized by Rule 92 of the Texas Rules of Civil Procedure, and requests that Plaintiff be required to prove his charges and



allegations against Defendant by a preponderance of the evidence as is required by the Constitution and law of the State of Texas.

### **III. Affirmative Defenses**

Defendant further avers that the injuries and damages complained of by Plaintiff were proximately caused by the failure of Plaintiff to do that which an ordinarily prudent person would have done under the same or similar circumstances or to do that which such a person would not have done under the same or similar circumstances.

Defendant affirmatively pleads Chapter 33 of the Texas Civil Practice & Remedies Code. If Defendant is found to be liable in this case, although Defendant specifically denies such, then Defendant requests the jury determine the percentage of proportionate responsibility, to the extent Plaintiff or any other Defendant in this case is found responsible and/or liable for the injuries and/or damages asserted by Plaintiff in this suit.

Plaintiff's injuries and damages, if any, were the proximate result, in whole or in part, of the negligence or other legal fault of various other individuals and entities who either have been or will be designated as responsible third parties pursuant to Chapter 33 of the Texas Civil Practice & Remedies Code. Defendant further contends that the respective percentages of fault of these individuals or entities should be taken into account when assessing Plaintiff's damages in accordance with Section 33.003(a) and other applicable provisions of Chapter 33 of the Texas Civil Practice & Remedies Code.

Defendant further pleads that Plaintiff failed to mitigate his damages.

Pleading further and in the alternative, Defendant invokes the provisions of Texas Civil Practice & Remedies Code § 18.091 that requires proof of loss of earnings, loss of earning capacity, loss of contribution of pecuniary value and other losses be presented in the form of a net loss after reduction for federal income tax liability.

Defendant presently has insufficient knowledge or information upon which to form a belief as to whether it may have additional, yet unknown, affirmative defenses. Accordingly, Defendant reserves the right herein to assert additional affirmative defenses in the event discovery indicates same would be appropriate.

#### **IV. Jury Demand**

Defendant respectfully demands a trial by jury in accordance with Rule 216 of the Texas Rules of Civil Procedure and pays the applicable jury fee as necessary.

#### **V. Prayer**

WHEREFORE, PREMISES CONSIDERED, Defendant Home Depot USA, Inc. prays that Plaintiff takes nothing by reason of its suit and that the Defendant be dismissed with their costs, and for such other relief, both general and specific, at law or in equity, to which Defendant may be justly entitled.

Respectfully submitted,

**LEWIS BRISBOIS BISGAARD & SMITH LLP**

/ s / Joelle G. Nelson

**JOELLE G. NELSON**

Texas Bar No.: 24032501

**AMANDINE E. SMITH**

Texas Bar No.: 24088428

**YOLANDA ORDONEZ**

Texas Bar No.: 24105907

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Houston, Texas 77046

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Fax: (713) 759-6830

[Joelle.Nelson@lewisbrisbois.com](mailto:Joelle.Nelson@lewisbrisbois.com)

[Amandine.Smith@lewisbrisbois.com](mailto:Amandine.Smith@lewisbrisbois.com)

**ATTORNEYS FOR DEFENDANT,  
HOME DEPOT U.S.A., INC.**

**CERTIFICATE OF SERVICE**

I hereby certify that a true and correct copy of the foregoing document has been served on all counsel of record pursuant to the Texas Rules of Civil Procedure on this the 14<sup>th</sup> day of June 2021:

**Counsel for Plaintiff**

Ezequiel Reyna, Jr.

Tomas A. Caquias

**LAW OFFICES OF EZEQUIEL REYNA, JR., P.C.**

702 W. Expressway 83, Suite 100

Weslaco, Texas 78596

Phone: 956.968.9556

Fax: 956.969-0492

Email: [ilsmiguel@zreynalaw.com](mailto:ilsmiguel@zreynalaw.com)

[dolivarez@zreynalaw.com](mailto:dolivarez@zreynalaw.com)

[tcaquias@zreynalaw.com](mailto:tcaquias@zreynalaw.com)

[cristina@zreynalaw.com](mailto:cristina@zreynalaw.com)

/ s / Joelle G. Nelson

JOELLE G. NELSON

# Exhibit “B-5”

**CAUSE NO. C-1838-21-J****JOSE LUIS CASTELLANOS**  
***Plaintiff*****v.****HOME DEPOT U.S.A., INC.**  
**d/b/a THE HOME DEPOT*****Defendants***§  
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§**IN THE DISTRICT COURT OF****HIDALGO COUNTY, TEXAS****430<sup>th</sup> JUDICIAL DISTRICT****DEFENDANT HOME DEPOT U.S.A., INC.'S SPECIAL EXCEPTIONS AND  
ANSWER TO PLAINTIFF'S ORIGINAL PETITION**

TO THE HONORABLE JUDGE OF SAID COURT:

COMES NOW, Home Depot U.S.A., Inc., ("Home Depot") Defendant in the above-styled and numbered cause of action and files its Special Exceptions and Answer to Plaintiff's Original Petition and would respectfully show the Court the following:

**I. Special Exceptions**

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**II. General Denial**

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allegations against Defendant by a preponderance of the evidence as is required by the Constitution and law of the State of Texas.

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Defendant affirmatively pleads Chapter 33 of the Texas Civil Practice & Remedies Code. If Defendant is found to be liable in this case, although Defendant specifically denies such, then Defendant requests the jury determine the percentage of proportionate responsibility, to the extent Plaintiff or any other Defendant in this case is found responsible and/or liable for the injuries and/or damages asserted by Plaintiff in this suit.

Plaintiff's injuries and damages, if any, were the proximate result, in whole or in part, of the negligence or other legal fault of various other individuals and entities who either have been or will be designated as responsible third parties pursuant to Chapter 33 of the Texas Civil Practice & Remedies Code. Defendant further contends that the respective percentages of fault of these individuals or entities should be taken into account when assessing Plaintiff's damages in accordance with Section 33.003(a) and other applicable provisions of Chapter 33 of the Texas Civil Practice & Remedies Code.

Defendant further pleads that Plaintiff failed to mitigate his damages.

Pleading further and in the alternative, Defendant invokes the provisions of Texas Civil Practice & Remedies Code § 18.091 that requires proof of loss of earnings, loss of earning capacity, loss of contribution of pecuniary value and other losses be presented in the form of a net loss after reduction for federal income tax liability.

Defendant presently has insufficient knowledge or information upon which to form a belief as to whether it may have additional, yet unknown, affirmative defenses. Accordingly, Defendant reserves the right herein to assert additional affirmative defenses in the event discovery indicates same would be appropriate.

#### **IV. Jury Demand**

Defendant respectfully demands a trial by jury in accordance with Rule 216 of the Texas Rules of Civil Procedure and pays the applicable jury fee as necessary.

#### **V. Prayer**

WHEREFORE, PREMISES CONSIDERED, Defendant Home Depot USA, Inc. prays that Plaintiff takes nothing by reason of its suit and that the Defendant be dismissed with their costs, and for such other relief, both general and specific, at law or in equity, to which Defendant may be justly entitled.

Respectfully submitted,

**LEWIS BRISBOIS BISGAARD & SMITH LLP**

/ s / Joelle G. Nelson

**JOELLE G. NELSON**

Texas Bar No.: 24032501

**AMANDINE E. SMITH**

Texas Bar No.: 24088428

**YOLANDA ORDONEZ**

Texas Bar No.: 24105907

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[Amandine.Smith@lewisbrisbois.com](mailto:Amandine.Smith@lewisbrisbois.com)

**ATTORNEYS FOR DEFENDANT,  
HOME DEPOT U.S.A., INC.**

**CERTIFICATE OF SERVICE**

I hereby certify that a true and correct copy of the foregoing document has been served on all counsel of record pursuant to the Texas Rules of Civil Procedure on this the 14<sup>th</sup> day of June 2021:

**Counsel for Plaintiff**

Ezequiel Reyna, Jr.

Tomas A. Caquias

**LAW OFFICES OF EZEQUIEL REYNA, JR., P.C.**

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[cristina@zreynalaw.com](mailto:cristina@zreynalaw.com)

/ s / Joelle G. Nelson

JOELLE G. NELSON



# Exhibit “B-6”

CAUSE NO. C-1838-21-J

JOSE LUIS CASTELLANOS  
Plaintiff

v

HOME DEPOT U.S.A, INC.  
Defendant

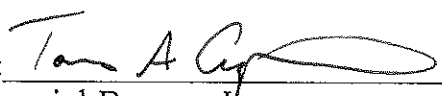
§ IN THE DISTRICT COURT  
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§ 430<sup>TH</sup> JUDICIAL DISTRICT  
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§  
§ HIDALGO COUNTY, TEXAS

**PLAINTIFFS' MOTION FOR DOCKET CONTROL CONFERENCE**

TO THE HONORABLE JUDGE OF SAID COURT:

Plaintiff(s) hereby requests that this Honorable Court set the above-styled and numbered cause for a Telephonic Docket Control Conference at the Court's earliest convenience.

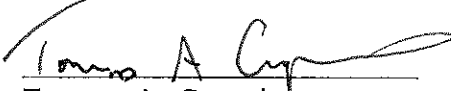
Respectfully submitted,  
LAW OFFICE OF EZEQUIEL REYNA

By:   
Ezequiel Reyna, Jr.  
State Bar No. 16794798  
[lsmiguel@zreynalaw.com](mailto:lsmiguel@zreynalaw.com)  
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702 W. Expressway 83, Suite 100  
Weslaco, Texas 78596  
Tel: (956) 968-9556  
Fax: (956) 969-0492  
ATTORNEYS FOR PLAINTIFF

**CERTIFICATE OF SERVICE**

By my signature below, I hereby certify that a true and correct copy of the foregoing document has been served on all counsel of record on June 15, 2021.

JOELLE G. NELSON  
AMANDINE E. SMITH  
YOLANDA ORDONEZ  
24 Greenway Plaza, Suite 1400  
Houston, Texas 77046  
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Tomas A. Caquias

# Exhibit “B-7”



LAURA HINOJOSA  
HIDALGO COUNTY DISTRICT CLERK

# Proposed Order

CAUSE NO. C-1838-21-J

JOSE LUIS CASTELLANOS  
Plaintiff

v

HOME DEPOT U.S.A, INC.  
Defendant§  
§  
§  
§  
§  
§  
§

IN THE DISTRICT COURT

430<sup>TH</sup> JUDICIAL DISTRICT

HIDALGO COUNTY, TEXAS

**ORDER SETTING HEARING**

On this day came to be considered the request for a Telephonic Docket Control Conference in the above-styled cause. The Court finds that such request is in order and hereby ORDERS that a Telephonic Docket Control Conference be scheduled for the 24<sup>th</sup> day of August 2021, at 3:00 o'clock p.m. The Clerk is to notify all parties.

6/15/2021 4:29 PM

SIGNED on this \_\_\_\_\_ day of \_\_\_\_\_, 2021.

  
JUDGE PRESIDING

cc: Mr. Ezequiel Reyna, Jr.  
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